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Ms R Barrett
C/O Jill Taylor, Programme Officer
Winchester City Council Offices,
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Winchester,
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SO23 9L

04 April 2025

BY EMAIL

Dear Ms R Barrett,

MATTER 1 HEARING STATEMENT – WINCHESTER DISTRICT LOCAL PLAN EXAMINATION IN PUBLIC

We write to you on behalf of our client, Bewley Homes, in respect of the Matters, Issues and Questions (Document ref. ED13) published as part of the Examination in Public ("EiP") into the emerging Winchester District Local Plan (2020-2040), prepared by Winchester District ("the Council").

Bewley Homes has interests in Land at Forest Road and Furzeley Road, Denmead and has submitted representations to both the Regulation 18 and Regulation 19 consultations.

This letter responds to Matter 1 and we can confirm that we wish to participate in the oral examination sessions relating to this matter.

Matter 1: Procedural/Legal Requirements

Issue: Whether all Statutory and Regulatory requirements have been met?

Duty to Cooperate

Q2. In particular in relation to the unmet housing need in Partnership of South Hampshire area (P_{SH}) and individual adjoining Councils, especially Portsmouth and Havant and Basingstoke in relation to the establishment of a new community at the Popham Airfield and Micheldever Station?

1. Bewley Homes do not consider that Winchester City Council ("WCC") has sought to adequately address the issue of unmet housing need across the South Hampshire Area, thereby maximising the effectiveness of the Local Plan to deliver much needed homes.
2. Whilst the agreement through the Housing Topic Paper published in January 2025 (Document ref. ED02), shows that 1,900 homes will be provided through the Winchester Local Plan to assist in meeting some of Havant's and Portsmouth's needs, with Fareham taking a further 800 homes of Portsmouth's unmet need. This still leaves an unmet need of 5,986 homes over a 20-year plan period across Havant and Portsmouth.
3. It is considered that WWC has failed to adequately address the scale of the unmet need through the Duty to Cooperate process. This is particularly important in light of the significant increase in housing numbers through the revised standard method for calculating housing need.

4. As can be seen from the table below, every single one of the authorities which make up the PfSH area, with the exception of Southampton, have seen an increase in their housing numbers. Overall, the housing need across the area has risen by 37%, almost 2,300 more homes each year.

Table 1: Local Housing Need calculations

LPA	LHN (pre-SM change)	LHN (March 2025)	% change
Eastleigh	645	911	41%
East Hampshire	575	1,119	95%
Fareham	498	797	60%
Gosport	339	433	28%
Havant	508	881	73%
Portsmouth	897	1,016	13%
Southampton	1,473	1,205	-18%
Test Valley	524	928	77%
Winchester	676	1,128	67%
Total	6,135	8,418	37%

5. Notwithstanding Winchester's own significant increase in housing need, failing to grapple with unmet need across the area now will only exacerbate the issue moving forward. As detailed elsewhere within our Matter Statements, failure to accommodate that significant unmet need within neighbouring authorities where housing targets are set to increase further, calls in the question of the effectiveness of the Local Plan. It is our assertion that WCC should have explored ways to meet a greater level of unmet need from neighbouring authorities, as well as its own, once it became clear that the standard method would substantially increase the housing requirement.

Sustainability Appraisal

Q3. The SA tested five spatial strategy options: a development strategy based on the adopted Local Plan, focusing development on Winchester and the larger more sustainable settlements; a strategy based on a new strategic allocation/new settlement; a strategy based on dispersing development around the District largely in proportion to the size of existing settlements; and, a variation of option 1, known as option 1A, which provides for a higher total number of dwellings. It takes account of existing commitments, windfall allowance and has the effect of reducing development in the South Hampshire Urban Area and increasing it in Winchester and the Market Towns and Rural Areas. Given national policy¹ that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas should an option with a higher growth target have been considered?

6. Yes, Bewley Homes is of the belief that an option which accounted for a higher number of dwellings should have been considered to take account of the unmet need of neighbouring authorities as well as delivering the full affordable housing need.
7. The Planning Practice Guidance ("PPG") requires Sustainability Appraisals to test reasonable alternatives. Further, these reasonable alternatives need to be sufficiently distinct in order to

“highlight the different sustainability implications of each so that meaningful comparisons can be made” (Paragraph ref. 11-018-20150306).

8. The Integrated Impact Assessment (“IIA”) outlines the five options which were tested by the Council. Four of these delivered 14,000 homes over the plan period with Option 1A delivering 15,620 homes. Option 1A was included following the responses to consultation and was intended to allow for headroom for any uncertainties including changes to the standard method or progress with the Partnership for South Hampshire Joint Strategy.
9. However, it is not considered that the headroom allowed for in Option 1A was sufficient and the Council should have included an option with a higher figure as it came apparent through the Duty to Co-operate that the unmet needs in neighbouring authorities were going to be higher than first thought.
10. In addition, through the work done in the Winchester District Strategic Housing Market Assessment (2020), it was clear that none of the options sought to address the unmet affordable housing need in full. This should have been included as a reasonable alternative within the SA.
11. The SA is an iterative process and should have included options which tested the ability to meet neighbouring unmet needs and the affordable housing need in full. Without these options, it is not considered that the Plan can be found sound as it is not effective, justified or fully evidenced.

Q4. In terms of assessing site selection, data relating to services and facilities was only available at the District level (i.e. for areas within the boundaries of Winchester District only) and this is noted as a limitation. In this regard, are the scoring and conclusions reached in the SA reasonable, sufficiently accurate and robust to inform the Plan?

12. As noted within our Regulation 19 representations, it is considered that Denmead has the ability to absorb, and indeed benefit from, greater levels of housing growth which correspond with its sustainability.
13. Local planning authority areas should not be considered in isolation and are instead permeable with multitudes of interlinking connections. Denmead lies at the edge of the district boundary of Winchester, close to the administrative boundaries of Havant. It is located less than a kilometre from the town of Waterlooville, which benefits from a wider range of facilities and amenities than in Denmead.
14. Therefore, the proximity of these additional amenities outside of the administrative boundaries of Winchester District are pertinent in the understanding of the wider sustainability of Denham, and its ability to accommodate growth. As such, in order for the scoring and conclusions within the Sustainability Appraisal to be considered reasonable, accurate and robust, data for areas outside of the administrative boundaries (i.e. Waterlooville), should be factored into the assessment.

Q5. How has the SA informed the development of the Plan, including housing delivery and any mitigation measures? How has it informed the selection of strategic options, the development of policies and the selection of sites, all of which aim to identify sustainable development outcomes for the District?

15. The Sustainability Appraisal is the basis for the formation of the spatial strategy and therefore the Plan as a whole. Any deficiencies within it are carried through and undermine the soundness of the Plan. The assessment of alternative options within the Sustainability Appraisal which included a higher housing number could have impacted the selection of strategic options and therefore the selection of sites, with sites capable of delivering against the Sustainability Appraisal objectives dismissed and not selected for development.

Q6. In overall terms does the Plan meet the legal requirements of Section 19(5) of the 2004 Act and accord with National Planning Policy Framework (NPPF) paragraph 32 and the Planning Practice Guidance (PPG) in this regard?

16. Without an assessment of a higher housing requirement to meet unmet need from neighbouring authorities or the affordable housing need, the Plan cannot be considered to fully address the relevant economic, social and environmental objectives as required under paragraph 32 of the NPPF 2023, nor does it comply with the PPG. On this basis, the Plan cannot be considered sound.

Summary

We look forward to receiving confirmation of this letter's receipt and to attending the hearing in due course.